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November 7, 2011

BY ECF

Hon. Dora L. Irizarry
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: United States v. Lance Schoner
11 Cr 486 (S-1) (DLI)

Dear Judge Irizarry:

Attached are the duly executed affidavits of the two (2) remaining suretors, Philip Geller and Sean O'Donnell. In accordance with Your Honor's directive, copies of these affidavits were provided to the government before I filed this letter and the government has no objection to them. In addition, I also previously forwarded copies of the affidavits to Pretrial Services. I am, therefore, respectfully seeking final approval from Your Honor of the proposed bond modification permitting Mr. Schoner to work for his father-in-law at Luigi's Restaurant.

Respectfully submitted,

/JRF/

James R. Froccaro, Jr.

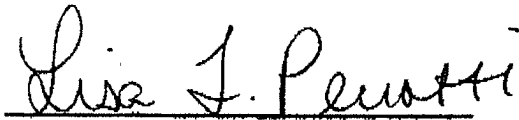
JRF:tp
Encls.

PHILIP GELLER, being duly sworn, deposes and says that:

I am a suretor on the \$5 million Appearance Bond of defendant Lance Schoner, in the matter of United States of America v. Lance Schoner, 11 Cr 486 (DLI). It is my understanding that Mr. Schoner has made an application to the Court to be permitted to work outside of his residence for his father-in-law at Luigi's Restaurant in the State of New Jersey. I have been provided with a copy of the transcript of the proceedings held before the Hon. Dora L. Irizarry in connection with this request on November 3, 2011, and have reviewed it in its entirety. I understand that I have a right not to consent to this modification on Mr. Schoner's Appearance Bond. But, I do, however, consent to this modification. I am aware that if Mr. Schoner fails to comply with any conditions of the Appearance Bond as modified and the bond is ordered forfeited, I will be jointly and severally liable, along with the other suretors, to pay the government \$5 million.


PHILIP GELLER

Sworn to before me this
7th day of November, 2011


Lisa I. Perotti


LISA FRANCES PEROTTI
NOTARY PUBLIC, STATE OF NEW YORK
QUALIFIED IN RICHMOND COUNTY
REG. # 01PE024875
MY COMM. EXP. JULY 11, 2015

SEAN O'DONNELL, being duly sworn, deposes and says that:

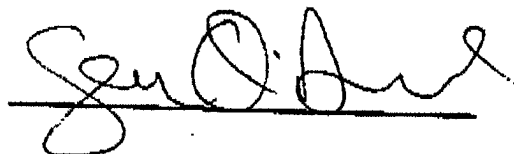
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Sworn to and subscribed
before me this
6 day of Nov., 2011


SEAN O'DONNELL

Sworn to before me this
6 day of November, 2011




LISA DAWSON
NOTARY PUBLIC OF NEW JERSEY
My Commission Expires 3/6/2016